



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

DEC 29 2014

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Michael Zidanic  
Technical and Maintenance Manager  
KmX Chemical Company  
30474 Energy Drive  
New Church, Virginia 23415

Dear Mr. Zidanic:

The United States Environmental Protection Agency (EPA) is in receipt of your letter requesting an additional 180 calendar days to respond to the EPA's November 19, 2014 information request letter. EPA's information request was sent under Section 114 of the Clean Air Act and requested additional information regarding KmX's operations and emissions of volatile organic compounds and hazardous air pollutants to the atmosphere. Your letter indicated that KmX needed an additional 180 days to respond due to the limited staffing at KmX, the learning curve involved with the software, and implementing changes as a result of an OSHA inspection. Specifically, Question #2 in Enclosure 2 of EPA's request requested that KmX provide a potential to emit from each storage tank at the facility using a process simulation software that would include working, breathing, and potential flashing loss.

EPA is aware that obtaining and utilizing process simulation software can take time and resources. However, there are third party vendors who can provide this service to KmX. You also indicated in your letter that KmX is employing external consultants to aid in responding to this request. Therefore, EPA is granting an additional forty-five (45) calendar days from the date of this letter to respond to this request. This extension comports with the time frames granted in similar information requests.

As with the previous response, failure to provide the required information may result in the issuance of an Order requiring compliance with the requirements, or the initiation of a civil action pursuant to Section 113(b) of the Act, 42 U.S.C. Section 7413(b). In addition, Section 113(c)(2) of the Act provides that any person who knowingly makes any false material statement, representation, or certification in, or omits material information from any document required pursuant to this Act shall upon conviction be punished by a fine pursuant to Title 18 of the United States Code, or by imprisonment for not more than two years, or both. The information you provide may be used by EPA in administrative, civil and criminal proceedings.

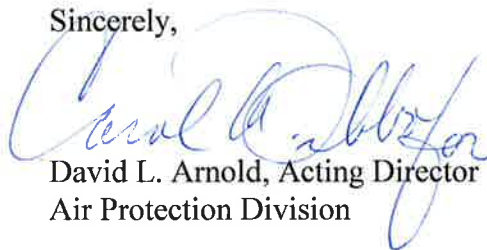
You are entitled to assert a business confidentiality claim, covering all or part of the information which this letter requires, except that no such claim can be made with respect to emission data as defined at 40 C.F.R. Section 2.301(a)(2) (Enclosure 4). Any such claim should be made in accordance with the procedures described at 40 C.F.R. Section 2.203(b). EPA will provide the public with information subject to a claim of business confidentiality only in accordance with the procedures set forth at 40 C.F.R. Part 2, Subpart B. EPA may provide the public with any information not subject to such a claim without further notice. The required submission of information pursuant to Section 114 is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Sections 3501, et seq.

Please submit your response to this request to:

Ms. Zelma Maldonado, Associate Director  
U.S. Environmental Protection Agency Region III  
Office of Air Enforcement & Compliance Assistance (3AP20)  
1650 Arch Street  
Philadelphia, PA 19103-2029

If you have any questions regarding this information request, please contact Bruce Augustine of the Air Protection Division at (215) 814-2131.

Sincerely,



David L. Arnold, Acting Director  
Air Protection Division